## UNITED STATES DISTRICT COURT OF THE DISTRICT OF NEW JERSEY

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DEMODU	JLA	TION,	INC.,

Plaintiff,

v.

CORNING, INC. ET AL.,

Civil Action No. 2:11-CZ-296

Defendants.

## **DECLARATION OF RUDOLPH W. GIULIANI**

Having been duly sworn, I, Rudolph W. Giuliani, being over the age of 18 years, and having personal knowledge of the statements contained herein, declare as follows:

- 1. I am the Chairman and Chief Executive Officer of Giuliani Partners LLC ("Giuliani Partners"), a management and security consulting business. I make this Declaration in connection with a subpoena for my appearance at a deposition in connection with the case captioned *Demodulation, Inc. v. Corning, Inc. et al.*, Civ. No. 2:11-CZ-296. My understanding is that the subpoena, dated January 15, 2014, names me personally and therefore calls for my appearance in my personal capacity.
- 2. As the CEO of Giuliani Partners, my current recollection is that Giuliani Partners entered into a consulting agreement with Applied DNA Sciences, Inc. ("ADNAS") in or around August 2004. All of these events occurred almost ten (10) years ago and my recollection is quite limited.

- 3. My current recollection is that I attended a few meetings with representatives of ADNAS nearly a decade ago. I have no current recollection of the identities of the ADNAS representatives at those meeting or the details of the discussions that took place. I also recall attending a conference at which some of the ADNAS representatives were present and I and others discussed ADNAS's technology. I do not recall if it was a conference sponsored by ADNAS or others at which they were present. I recall some time later I was informed of a negative article in the press about ADNAS. My partners and I decided to terminate our relationship with ADNAS, which we did in or about April 2005.
- 4. Another employee or employees of Giuliani Partners would have had responsibility for the relationship between Giuliani Partners and ADNAS in or around August 2004. As such, I have no unique or superior knowledge concerning the consulting arrangement between Giuliani Partners and ADNAS.
- 5. I do not have any documents in my personal possession that are responsive to the document requests contained in the subpoena.

I declare under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

DATED: February 24, 2014